

Exhibit C

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
3
4

5 CHASOM BROWN, WILLIAM BYATT,
6 JEREMY DAVIS, CHRISTOPHER
7 CASTILLO, and MONIQUE
8 TRUJILLO, individually and on
9 behalf of all other similarly
10 situated,

11 Plaintiffs,

12 No.

13 vs.

14 4:20-cv-03664-YGR-SVK

15 GOOGLE LLC,

16 Defendant.
17 _____/

18 VIDEOTAPED DEPOSITION OF BRUCE SCHNEIER
19 Remote Zoom Proceedings
20 Cambridge, Massachusetts
21 Monday, July 18, 2022
22

23 REPORTED BY:

24 LESLIE ROCKWOOD ROSAS, RPR, CSR 3462

25 Pages 1 - 233

Job No. 5312337

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1 question, you started with a dictionary definition that
2 says -- that offers as one definition "whose identity is
3 concealed or unavowed."

4 And I guess I'm trying to get at whether that is
5 accurate; right? I mean, if for the most part, you know, 14:17:08
6 a user is not identified in Incognito mode, then one
7 would argue, Google perhaps, that -- that the use of the
8 term is accurate.

9 And so I'm just asking if you have seen any
10 evidence to dispute that users' identities are not 14:17:25
11 concealed -- or are disputed that -- well, gosh, I lost
12 the thread.

13 A. I know.

14 Q. Have you seen any evidence that users'
15 identities are revealed when they are in Incognito mode? 14:17:39

16 A. I guess the only thing I've read was the
17 deposition of the former FBI agent who talked about being
18 able to uncover identities of people who are using
19 Incognito.

20 Something that you said earlier, and I -- that I 14:17:57
21 wanted to comment on, and I lost it. I should notes.
22 But I can't take notes.

23 Q. You can. I think I might be entitled to them at
24 the end, if you do, but...

25 A. Right. 14:18:15